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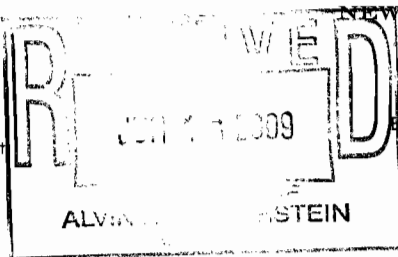
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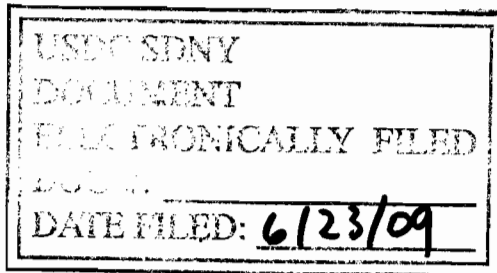
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June 15, 2009



Our Ref: 654-08/WJP/DJF

The motion for reconsideration is denied. Discovery by plaintiff cannot affect the factual and legal arrangements that control this case.
6-24-09
[Signature]

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BY HAND

The Honorable Alvin K. Hellerstein
United States District Judge
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street, Room 14D
New York, NY 10007-1312

RE: Dumitru Ungureanu v. M/V COURAGE, et al.
08 Civ. 8581 (AKH)

Dear Judge Hellerstein:

Please find enclosed herein a courtesy copy of Defendant WWL's Memorandum of Law in Opposition to Plaintiff's Motion for Reconsideration. Please note that due to a clerical mistake by our office, we erroneously filed Defendant's original Memorandum of Law in Support of Summary Judgment electronically on Friday afternoon, June 12, 2009. We have electronically filed the correct Memorandum of Law today, June 15, 2009. To the extent that plaintiff's attorney may require an additional day to file his reply papers, we would obviously consent to same. We apologize both to the court and to plaintiff's counsel for any confusion.

Respectfully submitted,
FREEHILL HOGAN & MAHAR LLP

[Signature]
William J. Pallas

WJP/grh
Enclosure

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w/enclosure